



**CenturyLink**  
14111 Capital Boulevard, Room 3162  
Wake Forest, NC 27587  
Phone 919-554-7621  
Facsimile 919-554-7913  
Jeanne.W.Stockman@centurylink.com

**Jeanne W. Stockman**  
Associate General Counsel

**VIA ECFS**

January 18, 2019

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: Application of Qwest Corporation d/b/a CenturyLink QC Pursuant to 47 C.F.R.  
§ 63.63 for the Emergency Impairment of Service

Dear Ms. Dortch:

On September 18, 2018, Qwest Corporation d/b/a CenturyLink QC (“CenturyLink”) filed the above-referenced application for the emergency impairment of service in limited portions of the Florence, Colorado wire center primarily as a result of damage sustained from flooding in mid-July 2018 (“Application”).<sup>1</sup> On November 19, 2018, CenturyLink filed to extend authority for this emergency impairment for an additional 60 days. CenturyLink has continued to explore options for service restoral and has kept the community informed and engaged in its efforts. However, in light of the substantial devastation in the region from this natural disaster as described in the Application, combined with the fact the area is still very unstable with active landslides ongoing, and now with the onset of severe winter weather that makes construction infeasible, wireline telecommunications services have not been fully restored. Accordingly, pursuant to Section 63.63(b) of the Commission’s Rules, 47 C.F.R. § 63.63(b), CenturyLink respectfully requests an additional 60-day extension of the authority for the emergency impairment of service in limited portions of the Florence wire center.

As stated in the Application, CenturyLink is still unable to state what effect this impairment may have on rates in the area as it continues to evaluate options to restore service. CenturyLink has supplied impacted customers with satellite phones for their use free-of-charge

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<sup>1</sup> There is not a docket number associated with this Application but pursuant to Sections 63.63(a), (b), 47 C.F.R. §§ 63.63(a), (b), and consistent with its initial Application filing in September, and its filing in November, CenturyLink is filing this extension request via the “Submit a Non-Docketed Filing” module of the Commission’s Electronic Comment Filing System.

through the end of February while this impairment is ongoing.<sup>2</sup> CenturyLink is exploring other alternatives for temporary service after that time and will work with affected customers to help ensure a seamless transition to any new temporary service option.

In its Application and in the extension filed in November, CenturyLink noted that the timing of service restoration would likely depend on the reconstruction of critical infrastructure in the area, namely County Road 386. As noted in those filings, the area is still experiencing landslides and is expected to be unstable for a prolonged period of time,<sup>3</sup> putting this preferred option for restoral on a lengthy timeline, at best, if it is viable at all. Rugged, mountainous terrain and instability in the area make it infeasible to install temporary cable to provide service. Now, with the onset of severe winter weather in the area, any potential construction is on hold until at least spring.

Other options will need to be pursued and CenturyLink continues its work with the Custer County Commissioners, the Colorado Department of Transportation, and the United States Forest Service to explore alternatives. CenturyLink held stakeholder meetings in December 2018 with these and other entities that could contribute to a solution to provide service to affected customers; however, additional time is needed to finalize and implement a plan to restore service. CenturyLink will continue to coordinate with other stakeholders and will report additional information regarding service restoral within approximately the next 60 days as part of the emergency impairment filing process under Section 63.63.

For the foregoing reasons, in light of the devastating flooding and continued construction challenges in the area, CenturyLink respectfully requests that the Commission approve a further 60-day extension of authority for the emergency impairment of service in limited portions of the Florence wire center.

Respectfully submitted,

**QWEST CORPORATION D/B/A  
CENTURYLINK QC**

By: /s/ Jeanne W. Stockman  
Jeanne W. Stockman  
CenturyLink  
14111 Capital Boulevard, Room 3162  
Wake Forest, N.C. 27587  
919-554-7621  
[Jeanne.w.stockman@centurylink.com](mailto:Jeanne.w.stockman@centurylink.com)

Its Attorney

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<sup>2</sup> It is CenturyLink's intent not to charge affected customers for services during the outage period.

<sup>3</sup> See Exhibit A to November 19, 2018 filing which is a summary of challenges related to rebuilding in the area prepared by the United States Forest Service.